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VIA ELECTRONIC FILING

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

March 1, 2024

MEMORANDUM ENDORSED

**Re: Request for extension of discovery
Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162**

Dear Judge Gorenstein,

This letter is written to request an extension of the discovery deadline, presently set for March 4, 2024, and for an extension of the deadline for the order required in the case management plan, presently set for March 11, 2024.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

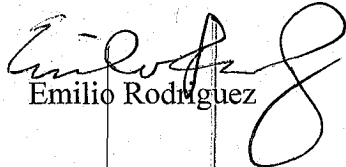
This is the thirteenth request for an extension of the discovery deadline. The extension is needed so the Plaintiff can complete his review of the documents provided to him. After discussing it with him, Plaintiff informed me he consents to the request of the extension of the discovery deadline.

PLEASE RESPOND TO BROOKLYN OFFICE

This letter proposes a change of the discovery deadline from March 4, 2024, to April 18, 2024. This, in turn, affects the deadline for the order required by the case management plan, presently set for March 11, 2024. We propose changing it to April 25, 2024.

Therefore, Plaintiff and I make this joint request to extend the deadlines for discovery and the order required in the case management plan.

Yours faithfully
Polizzotto & Polizzotto, LLC


Emilio Rodriguez

The discovery deadline is extended to April 18, 2024. The letter to Judge Schofield as required by paragraph 13.b of Docket #77 shall be filed by April 25, 2024. Any further request for an extension must be accompanied by a sworn statement from each side explaining all efforts that were made to comply with the deadline starting today and showing why meeting the Court-ordered deadline was not possible.

So Ordered.


GABRIEL W. CORENSTEIN
United States Magistrate Judge

March 4, 2024